

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03 MDL 1570 (RCC) ECF Case
<i>This document relates to:</i>	

Euro Brokers, et al. v. Al Baraka, et al., 04 CV 7279 (RCC)
World Trade Center Properties LLC, et al. v. Al Baraka, et al., 04 CV 7280 (RCC)
Federal Insurance Company, et al. v. Al Qaida, et al., 03 CV 6978 (RCC)
New York Marine and General Insurance Co. v. Al Qaida, et al., 04 CV 6105 (RCC)
Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al.,
 03CV 9489 (S.D.N.Y.)

**DECLARATION OF JODI WESTBROOK FLOWERS IN SUPPORT OF PLAINTIFFS'
MEMORANDUM OF LAW IN OPPOSITION TO MOTION TO DISMISS FILED BY DEFENDANT
YUSEF JAMEEL**

Jodi Westbrook Flowers declares as follows:

1. I am a Member at the firm of Motley Rice, LLC, counsel for Plaintiffs in *Euro Brokers, et al. v. Al Baraka, et al.*, 04 CV 7279 (RCC); *World Trade Center Properties LLC, et al. v. Al Baraka, et al.*, 04 CV 7280 (RCC), and *Burnett v. Al Baraka* 03 CV 9489 (S.D.N.Y.). I submit this Declaration in support of Plaintiffs' Memorandum of Law in Opposition to Motion to Dismiss filed by defendant Yousef Jameel.

2. Exhibit 1 is a true and accurate copy of the Affidavit of David K. Draper including Attachments A - U referenced therein, executed on June 8, 2005, and filed with this Court that same day in the matter of *In Re Terrorist Attacks on September 11, 2001*, MDL No. 1570 (RCC), docket # 977, in support of Plaintiffs' Supplemental Memorandum in Opposition to Motions to Dismiss of Wa'el Hamza Jelaidan, Khalid bin

Mahfouz and Yousef Jameel.

3. Exhibit 2 is a true and accurate copy of a timeline prepared by Plaintiffs' counsel.

4. Exhibit 3 is a true and accurate copy of a check which appeared in Paris Match on June 23, 1992, from Mr. Jameel to Abassi Madani and the Islamic Salvation Front of Algeria (or "FIS") and a copy of a webpage located at <http://www.teror.gen.tr/english/other/middleeast/fis.html> describing the Islamique du Salut Front (FIS).

5. Exhibit 4 is a true and accurate copy of an article published in the New York Times entitled "Saudis Strip Citizenship From Backer of Militants", written by Yousef M. Ibrahim and dated April 9, 1994.

6. Exhibit 5 is a true and accurate copy of excerpted pages of the criminal indictment filed against Sami Al-Arian.

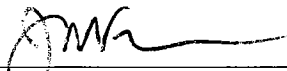
7. Exhibit 6 is a true and accurate copy of excerpted pages of a phonebook seized from S.D.G.T. Yousef Nada in 2001 in the course of the Swiss prosecution of Nada.

8. Exhibit 7 is a true and accurate copy of two articles which were published in The Guardian (London). The first article entitled "Kidnap Punches Hole in Law: Thatcher to be the Last Line of Appeal in Parents' Tussle Over Girl," was written by Sarah Boseley, and it was published on July 18, 1998. The second article entitled "Howe May Seek Saudi King's Help Over Kidnap," was also written by Sarah Boseley, and it was published on July 19, 1998.

9. Exhibit 8 is a true and accurate copy of two fatwahs issued by Osama bin


Laden. The first was issued in 1996, and the second was issued in 1998.

10. Exhibit 9 is a true and accurate copy of an article published in Arab News entitled "Jameel Donates \$1m to AUC" published on March 1, 2000.



Jodi Westbrook Flowers

Sworn to and Subscribed Before Me,
This 16th Day of September ____, 2005.

Signed: 

Notary Public of South Carolina

My Commission Expires: 10-18-2011